



Supportive Services for Veteran Families (SSVF) Webinar Series

SSVF Compliance FOFA Closeout and Recoupment of Unallowable Costs

February 23, 2023

[Link to Audio](#)

Presenters

Nikki Barfield, SSVF Deputy Director

Rico Aiello, SSVF Compliance Project Coordinator

Housekeeping



45 minutes



Slides &
handouts
are in the
“handout
” section



Recording,
Handouts &
Slides will
be sent via
email



Submit
questions in
the question
box or any
time at
ssvf@va.gov

Financial and Operational Fitness Audit (FOFA) Goals

- Ensure compliance with SSVF Regulatory Guidance (38 CFR Part 62), SSVF Program Guide, Notice of Funding Availability (NOFA), Grant Agreements and other Uniform Grant Guidance (2 CFR Part 200).
- Determination of unallowable and questionable costs subject to recoupment.
- Provide the SSVF Program Office with an assessment of the Grantees ability to meet the needs of Homeless Veterans.
- Review Grantee's internal systems to detect and prevent fraud, waste and abuse.

Financial and Operational Fitness Audit (FOFA)

- 50% of grantees reviewed per year. Each grantee will have an Audit or FOFA visit every other year.
- Input from Regional Coordinators.
- Financial Objectives - Review of all SSVF costs and expenditures.
- Validate accuracy of information regarding grantee performance.
- Determine compliance for those activities.

Financial and Operational Fitness Audit (FOFA)

Purpose

- Evaluate the reasonableness of judgments made for those activities.
- Ascertain grantee's ability to ensure subcontractors compliance.
- Verify the accuracy of the grantee's records.
- Identify apparent causes of any problem(s).
- Follow up on problems identified during the assessment.
- Improvement expected with education, training and Recommendations for Improvement.

FOFA Purpose cont.

- Provide consistent guidance on findings and recommended improvement areas.
- Provide Grantee Management/Board of Directors with an external assessment of organizational practices and procedures.
- Introduce a Corrective Action Plan follow-up/review close-out process.
- Discuss challenges and opportunities (best practices, program/process standardization and common approaches).

Recoupment Process

- FOFA process (Notification thru onsite visit)
 - Grantee opportunity to provide supporting documentation
- FOFA issued to Grantee
 - Grantee responds to report and provides an action plan addressing each finding (Appendix A) and additional opportunity to dispute findings and submit supporting documentation
- OBO closes out the FOFA after verifying Appendix A completion
- SSVF Program Office reviews final report and makes assessment of unallowable and questionable costs subject to recoupment
- SSVF Issues a Notice of Indebtedness (NOI) to SSVF grantee which provides a final amount of funds subject to recoupment



Executive Brief

SSVF Grantee
Town, State

What Did We Do and What Did We Find

The Office of Business Oversight (OBO) completed a Supportive Services for Veteran Families (SSVF) Review of SSVF Grantee in Town, State.

OBO performed a review to assess the grantee's compliance with Title 38, Code of Federal Regulations (CFR) 62, SSVF Program and other applicable Federal requirements and regulations during the programmatic year ending in 2020, 2021 as well as Coronavirus Aid, Relief, and Economic Security Act (CARES) funding and any extensions granted to exhaust funds for the corresponding years.

OBO found the following:

Questioned Costs	
Program Area	Cost
Total	

Why It Happened

Review findings were primarily caused by:

What Let It Happen

Identified errors occurred due to:

What Can Be Done To Fix It

OBO recommends SSVF Grantee do the following:

FOFA Predetermination Letter

- Included in the FOFA report issued to each grantee.
- What does this mean?
 - SSVF Program Office can recoup “All unallowable and questionable costs” that occurred with SSVF grant funds.
 - Pre-determination of any questioned costs that may result in funds due back to the Department of Veterans Affairs (VA).
- Please review and provide a plan for the correction of the issues identified in the report. This is your opportunity to respond and dispute any existence or amount of debt should questioned costs be involved.
- Determination of costs for recoupment - Funds or actions that result in a Non direct benefit to program or Veterans.

Recoupment Options for SSVF Grantees

- Issuance of Notice of Indebtedness (NOI)
- Payment of debt within 30 days of receipt of NOI
 - check or money order payable to the Department of Veterans Affairs, Financial Services Center, Agent Cashier Office (0474C)
- Option to set up a repayment plan
 - If unable to pay the full amount in one payment, contact the Agent Cashier Office within 30 days of the date of the letter to work out a satisfactory repayment plan
- Grantee Rights to dispute the debt
 - If you do not believe you owe the debt or you think the amount is incorrect; you have the right to dispute the debt. You also have a right to request a waiver of the debt.
- Regardless of whether you dispute the debt or request waiver, if your unable to pay the full amount in one payment, you should contact the Agent Cashier Office within 30 days of the NOI.

Example Items Subject to Recoupment

- Food for staff meetings, staff luncheons
- SWAG, clothing for staff
- Excessive costs for equipment and furniture
- Travel and Education not associated with SSVF Program
- Salary charged to SSVF for non SSVF work
- Unallowable Advertising costs
- Costs-expenses that do not have supporting documentation
- Costs-expenses that are not equitable (overcharge to SSVF Program)
- Administrative costs with no supporting documentation

Questions

- For questions related to Recoupment process, please contact Rico Aiello at:
 - Riccardo.Aiello@va.gov

Supportive Services for Veteran Families

Thank you

Questions?

Email: SSVF@va.gov